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R E M A R K S

Reconsideration of the present application in view of the following remarks is respectfully requested. Claims 10 and 21 were previously canceled. Twenty-one claims are pending in the application: Claims 1-9, 11-20, and 22-23.

Summary of Applicant Initiated Examiner Interview

1. Per 37 CFR § 133(b), the following is a brief summary of the Examiner interview conducted on April 18, 2006 via telephone between Martin R. Bader (Reg. No. 54,736) and Examiner Peling A. Shaw.

At the outset, Applicant would like to thank the Examiner for his time during the interview. During the interview, independent claim 1 was discussed in view of U.S. Patent Application No. 2002/0178361 (*Genty et al.*). There were no exhibits shown. There were no claim amendments discussed. Applicant presented arguments that *Genty et al.* did not teach or suggest "establishing a VPN tunnel between said at least one client computer having said network address and said server-side system, where said VPN tunnel is established over said modem" and "establishing a new VPN tunnel between said different client computer having said new network address and said new server-side system, where said VPN tunnel is established over said modem." Independent claim 1 recites at least two computers coupled to the same modem within a client side system through which different VPN tunnels are established.

The Examiner stated that he agreed that *Genty et al.* did not appear to teach Applicants' claimed invention. The Examiner requested that a formal response be filed and that the

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likely outcome would be to withdraw the finality of the final office action and do another search.

35 U.S.C. ' 102

2. Claims 1-5, 8-9, 11-16, 19-20, and 22-23 stand rejected under 35 U.S.C. ' 102(e) as being anticipated by U.S. Publication No. 2002/0178361 (*Genty et al.*).

At the outset, Applicant would again like to thank the Examiner for his time during the telephonic interview on April 18, 2006. As stated in the "Summary of Applicant initiated Examiner Interview," during the Examiner Interview the Examiner agreed that it did not appear that *Genty et al.* teaches all of the elements of Applicants invention as required to support a rejection under 35 U.S.C. ' 102.

Specifically regarding claim 1, Applicants argued that *Genty et al.* did not teach "establishing a VPN tunnel between said at least one client computer having said network address and said server-side system, where said VPN tunnel is established over said modem" and "establishing a new VPN tunnel between said different client computer having said new network address and said new server-side system, where said VPN tunnel is established over said modem." Applicants note that *Genty et al.* do not show establishing more than one VPN tunnel through a single modem (See Figure 1 and paragraph 0039 of *Genty et al.*).

Turning now to the present rejection under 35 U.S.C. ' 102(e). *Genty et al.* disclose a Virtual Private Network (VPN) that includes a system and method for dynamically determining a Certificate Revocation List (CRL) location and protocol. Figure 1 of *Genty et al.* shows one computer system 100 communicating

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with various VPNs by establishing multiple tunnels, one corresponding to each VPN (See Genty et al. paragraph 0039). Figure 1 shows a computer system 100 using the computer network 110 to communicate to computers 130, 150, 170, using three Virtual Private Networks (VPN "A", VPN "B", VPN "C"). Three tunnels (one for each VPN) are shown connecting the computer system 100 to the first computer system 130, the second computer system 150 and the third computer system 170. Figure 1 clearly shows that there are many computers included within VPN "A" that are connected to the server using a single VPN tunnel.

As recited above, two different VPN tunnels are established over the same modem in Applicants' claim 1. Figure 1 of Genty does not show the "new VPN tunnel" recited in Applicants claims. Figure 1 and the paragraphs describing Figure 1 in Genty only describe a single VPN tunnel being established that is used by all of the computers within, for example, VPN "A".

In the "Response to Arguments" section of the Final Office Action, it is stated that Genty shows multiple clients establishing multiple VPNs (multiple users) through one modem via Internet. However, Applicants' claims recite establishing multiple VPN tunnels through a single modem. Figure 1 of Genty shows a system for having multiple computers at a single site connected to a server through a single VPN tunnel, but does not shown multiple tunnels through the same modem.

Thus, Genty et al. does not teach or suggest establishing *two different VPN tunnels* through the same modem and thus do not teach or suggest "establishing a VPN tunnel between said at least one client computer having said network address and said server-side system, where said VPN tunnel is established over said modem" and "establishing a new VPN tunnel between said

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different client computer having said new network address and said new server-side system, where said VPN tunnel is established over said modem," such as is claimed by Applicants.

Therefore, Applicant respectfully submits the rejection of claim 1 is overcome.

Similarly to claim 1, claim 11 recites in part *"establishing a VPN tunnel between said at least one client computer having said network address and said server-side system, where said VPN tunnel is established over said modem" and "establishing a new VPN tunnel between said different client computer having said new network address and said server-side system, where said VPN tunnel is established over said modem."*

As stated above, the *Genty et al.* fails to teach or suggest these limitations of Applicants' claim. Specifically, *Genty et al.* fails to teach establishing both a *first VPN tunnel over a modem* and establishing a *second VPN tunnel over the same modem*. Thus, Applicant respectfully submits that the rejection of claim 11 is overcome.

Applicants also respectfully submit that all of the pending claims are not anticipated by *Genty et al.* for at least all the same reasons as stated above with reference to claims 1 and 11. Thus, the rejection of claims 1-5, 8-9, 11-16, 19-20, and 22-23 is overcome.

35 U.S.C. ' 103

3. Claims 6 and 17 stand rejected under 35 U.S.C. ' 103(a) as being unpatentable over U.S. Publication No. 2002/0178361 (*Genty et al.*).

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For at least the same reasons as stated above with reference to the rejection under 35 U.S.C. ' 102(e), Applicants also respectfully submit that claims 6 and 17 are not rendered obvious by the Genty et al. at least because of their dependency upon independent claims 1 and 13. Thus, the rejection is overcome.

4. Claims 7 and 18 stand rejected under 35 U.S.C. ' 103(a) as being unpatentable over U.S. Publication No. 2002/0178361 (Genty et al.) in view of U.S. Patent Application No. 2002/0169988 (Vandergeest et al.).

As stated above with reference to the rejections under 35 U.S.C. ' 102(e), Genty et al. does not teach or suggest "establishing a VPN tunnel between said at least one client computer having said network address and said server-side system, where said VPN tunnel is established over said modem" and "establishing a new VPN tunnel between said different client computer having said new network address and said server-side system, where said VPN tunnel is established over said modem."

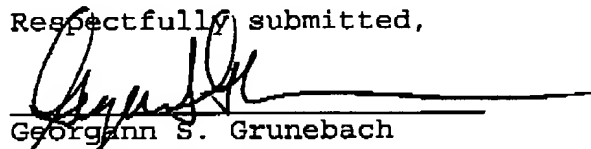
Furthermore, Applicants respectfully submit that Vandergeest et al. does not teach or suggest these elements of Applicants invention. Thus, Applicants respectfully submit that the combination of Genty et al. in view Vandergeest et al. does not present a *prima facie* case of obviousness of independent claims 1, 11, 13 and 22. Thus, Applicants respectfully submit that claims 7 and 18 are allowable at least because of their dependency upon an allowable independent claim. Thus, Applicants respectfully submit the rejection is overcome and request a timely notice of allowance.

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C O N C L U S I O N

In view of the above, Applicants submit that the pending claims are in condition for allowance, and prompt and favorable action is earnestly solicited. Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone the undersigned at (310) 964-4615 so that such issues may be resolved as expeditiously as possible.

Respectfully submitted,


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